

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,

Plaintiffs,

v.

STANLEY TAYLOR, et al.,

Defendants.

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT CHRIS SENATO

Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the
extent of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department
of Corrections?

2. Are you under the influence of any medication?

3. Have you had a chance to meet and discuss the case with
defendants' counsel?

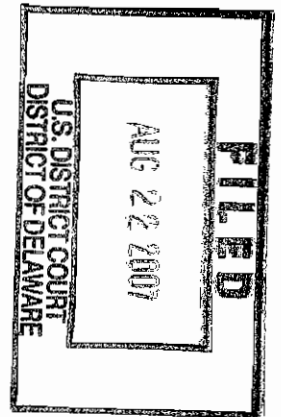
4. Have you had a chance to review the Amended Complaint, your
"Response to Plaintiffs' Interrogatories", and any previous statements
you given to defendants' counsel or any one else in connection with this
case before coming here today?

5. Do you realize that you are under oath, just as if you were
at trial testifying.

6. Is there any reason you can't give your best testimony today?

7. Since the filing of the institutional grievance and lawsuit, by
the named Plaintiffs, have the condition in the kitchen improved.

8. Does SCI main kitchen unit maintains certification records of
all food service inspection, containing the name of the person who performed



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the inspection and serial number, or other identifier of kitchen equipment?

9. Have you personally recorded the air temperature on the "old" side of the kitchen area, and compared to the "new" side area of the SCI main kitchen? If so, what was the results.

10. What is the SCI inmate work policy or procedure in place at the SCI kitchen, to handle complaint by inmates workers who believe there is an imminent danger at the work place?

11. Do you agree or disagree? When a person is working under a condition that exhibits excessive heat and high humidity, a persons body works at a much higher stress level due to the lack of oxygen in the air.

12. When inmate kitchen workers was housed in the air condition cool Merit buiding, if they refused to work, or get fire, would that inmate received a major disciplinary report (class I), and immediately moved to a less disirable building?

13. In your "Response no. 4 to Plaintiffs' Interrogatories", you alleged that, "An outside contractor, Going Clean, steam cleans the hood systems. Did Going Clean ever steam clean the SCI main kitchen hood system prior to August 9, 2002?

14. In your "Response no. 2 to Plaintiffs' Interrogatories", you alleged "there have been no recorded medical illinesses or incidents of dehydration from an inmate worker in the SCI kitchen." When an inmate complain of any illiness, does the SCI food service staff diagnose the inmate, or is he refer to the medical unit to be examined by the proper authorized personnel?

15. During the summer when temperature rise and/or exceed 100 degree, inmates are instructed to drink plenty of liquids on these days. Are you aware there is only one (1) toilet seat for 22 to 25 inmate workers to use which forces workers to wait long periods, or even relieve themselves in floor drains?